

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING )  
PHARMACY, INC., PRODUCTS LIABILITY )  
LITIGATION )  
  ) MDL No.: 2419  
  ) Master Docket No.: 1:13-md-2419-FDS  
\_\_\_\_\_ )  
THIS DOCUMENT RELATES TO:         )  
  )  
  )  
  All Actions Against St. Thomas Neurosurgical)

**PLAINTIFFS' STEERING COMMITTEE'S MOTION IN LIMINE TO EXCLUDE  
REFERENCE TO MICHAEL O'NEAL, O'NEAL'S PHARMACY CONSULTING  
SERVICES, AND ST. THOMAS NEUROSURGICAL'S MEDICAL EXECUTIVE  
COMMITTEE**

For the reasons set forth in the accompanying Supplemental Brief Concerning Motion to Compel Compliance with Subpoena to Michael O'Neal and Motion for Protective Order or, in the Alternative, Memorandum in Support of Motion *In Limine*, the PSC hereby requests that, if the Court finds that the QICP precludes the PSC from conducting unfettered discovery concerning Mr. O'Neal's relationship with St. Thomas Neurosurgical, the Court exclude all references to Michael O'Neal, O'Neal's Pharmacy Consulting Services, and St. Thomas Neurosurgical's Medical Executive Committee at trial.

Date: January 25, 2016

Respectfully submitted:

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**CERTIFICATE OF SERVICE**

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing document to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: January 25, 2016

/s/ Benjamin A. Gastel

Benjamin A. Gastel